

# EXHIBIT 1

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE WESTERN DISTRICT OF VIRGINIA  
3                   CHARLOTTESVILLE DIVISION

4   ELIZABETH SINES, SETH WISPELWEY,        )

5   MARISSA BLAIR, TYLER MAGILL, APRIL    )

6   MUNIZ, HANNAH PEARCE, MARCUS MARTIN,)

7   NATALIE ROMERO, CHELSEA ALVARADO,     )

8   AND JOHN DOE,                            )

9                   Plaintiffs                )

10    )

11   VS.                                      )CIVIL ACTION

12    )NO. 3:17-cv-00072-NKM

13   JASON KESSLER, ET AL.,                )

14                   Defendants              )

15                   -----

16                   VIDEOTAPED ORAL DEPOSITION OF

17                   THOMAS RYAN ROUSSEAU

18                   OCTOBER 16, 2019

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25   JOB #169672

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1                   VIDEOTAPED ORAL DEPOSITION OF  
2    THOMAS RYAN ROUSSEAU, produced as a witness at the  
3    instance of the PLAINTIFFS, and duly sworn, was taken in  
4    the above-styled and numbered cause on the 16th day of  
5    October, 2019, from 9:07 a.m. to 4:29 p.m., before  
6    Kathryn R. Baker, CSR, RPR, in and for the State of Texas,  
7    reported by machine shorthand, at the offices of U.S.  
8    District Court Clerk, 501 W. 10th Street, Suite 310, in  
9    the City of Fort Worth, State of Texas, pursuant to the  
10   Federal Rules of Civil Procedure.

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# THOMAS RYAN ROUSSEAU

Q. (BY MR. SIEGEL) I'm handing you a document that's been previously marked as Exhibit 4.

A. (Witness reviews document.)

Q. This is an order from the court in the Sines v. Kessler litigation. If you look at the first sentence, it says, This matter is before the Court on plaintiff's motion for leave to depose non-party Thomas Ryan Rousseau, as an authorized representative for Defendant Vanguard America. For reasons stated in plaintiff's motion, the motion is granted.

Do you see that?

A. Yes.

Q. Do you understand that you're here as a representative of Vanguard America?

A. I understand that that's what the document says, yes.

Q. Understood.

Could you do me a favor, just lower the papers for the video, so you don't hold it in front of your face.

A. (Witness nods head affirmatively.)

Q. Thank you.

24 Have you ever gone by a different name,  
25 other than your full legal name?

## THOMAS RYAN ROUSSEAU

Q. -- affiliated with Vanguard America?

A. No.

Q. Okay. Do you know personally everyone who has posted to a Discord server --

A. No.

Q. -- operated by Vanguard America?

A. No, I didn't know everyone personally.

9 Q. Have you read everything that's ever been posted  
10 to a Discord server --

A. No.

Q. -- affiliated with Vanguard America?

13           A.     No.    But I would like to reiterate, I never  
14    received any piece of information, evidence, knowledge  
15    whatsoever, nor have I ever heard anyone claim to have any  
16    piece of information, evidence, knowledge whatsoever that  
17    implies that Fields was in any way associated with the  
18    organization, other than the fact he was geographically  
19    present.

20 The Queen of England could have been on the  
21 servers for all possibility. For all it's possible,  
22 anyone could have been there.

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8 NATALIE ROMERO, CHELSEA ALVARADO, )

9 AND JOHN DOE, )

10 Plaintiffs )

11 )

12 VS. )CIVIL ACTION

13 )NO. 3:17-cv-00072-NKM

14 JASON KESSLER, ET AL., )

15 Defendants )

16 REPORTER'S CERTIFICATION

17 ORAL DEPOSITION OF THOMAS RYAN ROUSSEAU

18 OCTOBER 16, 2019

19 I, Kathryn R. Baker, RPR, a Certified Shorthand  
20 Reporter in and for the State of Texas, hereby certify to  
21 the following:

22 That the witness, THOMAS RYAN ROUSSEAU, was duly  
23 sworn by the officer and that the transcript of the oral  
24 deposition is a true record of the testimony given by the  
25 witness;

## THOMAS RYAN ROUSSEAU

That the deposition transcript was submitted on the 22nd day of October, 2019 to the witness or to the attorney for the witness for examination, signature and return to me by the 21st day of November, 2019;

That pursuant to information given to the deposition officer at the time said testimony was taken, the following includes all counsel for parties of record:

Mr. Joshua M. Siegel, Mr. Daniel P. Roy, III,  
and Mr. Michael Bloch, Attorneys for the PLAINTIFFS

Mr. James Kolenich, Attorney for the DEFENDANTS,  
JASON KELLER, ET AL.

Mr. John DiNucci, Attorney for the DEFENDANT,  
RICHARD SPENCER

Mr. Justin Gravatt, Attorney for the DEFENDANT,  
JAMES FIELDS

Mr. Brent Gleason, Attorney for the WITNESS

I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

That \$\_\_\_\_\_ is the deposition officer's charges to the Plaintiffs for preparing the original deposition transcript and any copies of exhibits;

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1 THOMAS RYAN ROUSSEAU

2 Certified to by me this 22nd day of October,  
3 2019.

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6 KATHRYN R. BAKER, RPR, CSR #6955  
7 Expiration Date: 04/30/2021  
8 Firm Registration No. 615  
9 TSG Reporting  
10 747 Third Avenue, 10th Floor  
11 New York, New York 10017  
12 877-702-9580

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